

Fill in this information to identify the case:

Debtor 1 David Mondragon

Debtor 2
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of PA

Case number 18-12945 PMM

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: M&T Bank

Court claim no. (if known): 1-1

Last 4 digits of any number you use to identify the debtor's account: 5143

Property address:

1540 Penn Avenue
Wyomissing, PA 19610

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 05 / 01 / 2023

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ _____

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____

c. Total. Add lines a and b. (c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Debtor(s) David Mondragon
First Name Middle Name Last Name

Case Number (if known): 18-12945 PMM

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/ Michael Farrington

Date 05/11/2023

Michael Farrington
11 May 2023, 14:38:57, EDT

KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 16106
215-627-1322
bkgroup@kmlawgroup.com
Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: David Mondragon Jr.

Debtor(s)

M&T Bank

Movant

vs.

David Mondragon Jr.

Debtor(s)

Scott F. Waterman,

Trustee

BK NO. 18-12945 PMM

Chapter 13

Related to Claim No. 1-1

**CERTIFICATE OF SERVICE
RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Michael P. Farrington of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on May 11, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below;

Debtor(s)

David Mondragon Jr.
1540 Penn Avenue
Wyomissing, PA 19610

Attorney for Debtor(s) (via ECF)

Joseph L. Quinn
Ross, Quinn & Ploppert, P.C.
192 S. Hanover Street, Suite 101
Pottstown, PA 19464

Trustee (via ECF)

Scott F. Waterman
Chapter 13 Trustee
2901 St. Lawrence Avenue
Suite 100
Reading, PA 19606

Method of Service: electronic means or first-class mail

Dated: May 11, 2023

/s/ Michael P. Farrington

Michael P. Farrington Esq.
Attorney I.D. 329636
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
(215) 825-6488
mfarrington@kmlawgroup.com